

**To:** Joint Steering Committee for Revision of AACR  
**From:** Canadian Committee on Cataloguing  
**Subject:** **AACR3 Area 4 Example of Simplified Rules**

CCC agrees with the ACOC response that simplification of the rules as much as possible is wanted. However, we think that the LC proposal is too stripped down and there is concern that rule interpretations will be required to give guidance absent from the proposed simplified rules. We are in agreement with most of the issues raised in the ACOC response.

In addition, we offer the following specific comments that refer only to the principles of the proposal and not to style or wording.

The LC proposal suggests that the Levels of description document would address optional data elements to be given in Area 4. At present 5JSC/ACOC rep/1 (Levels of description, access, and authority control) only states what is mandatory at the minimum and standard levels, i.e., first named, etc. As such, the proposed rules would suffice. However, with regard to the optional data elements itemized in Table I, (e.g., 2.6.2, 2.6.3), further guidance in the rules on the transcription or the recording of the optional elements is required in order to avoid inconsistency in these elements. For example, some specific guidance is needed for the following:

- Former A1.4C5, A1.4D4 (1.4C5): when a subsequent place, name is given prominence by typography
- Former A1.4D3 (1.4D3): when there are phrases, etc., indicating function (other than solely publishing)
- Former A1.4D4 (1.4D4): when subsequent entities are linked in a single statement

We agree with transcription of place and larger jurisdiction as they appear on the resource although in some instances, it would mean more transcription if abbreviations (according to current appendices) are not used. Even though the option allows the addition of the larger jurisdiction in square brackets when necessary for identification, there is no guidance as to the use of abbreviations. How will this fit in with the proposed **1.6 Transcription** in the new draft of RDA?